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August 14, 2024

Hon. Glenn T. Suddaby, U.S. District Judge
Federal Building and U.S. Courthouse
P.O. Box 7367
Syracuse, NY 13261-7367

Via ECF

**Re: *Pinnacle Holding Company, LLC, et. al v. Michael Allen, et al.*, Civil
Action No. 5:24-cv-239 (GTS/TWD)**

Dear Judge Suddaby:

As you know, this office is counsel for the Plaintiffs. We write pursuant to Local Rule 7.1(b)(1) to request permission to file an over-size Memorandum of Law in opposition to the Defendants' motion to dismiss the Amended Complaint. The Plaintiffs' opposition is due tomorrow, August 15, 2024.

Additional briefing is necessary due to the large number of grounds identified in the Defendant's motion, the complexity of personal jurisdiction over the foreign defendants, and the extensive factual and procedural history of the case, which is important to many of the dismissal arguments. The Defendants' motion challenges personal jurisdiction, venue and the legal sufficiency of five of the amended Complaint's causes of action.

We therefore request leave to file a Memorandum of Law not to exceed 40 pages. We thank the Court for its attention to this matter.

Respectfully submitted,

HANGCOCK ESTABROOK, LLP

A handwritten signature in black ink, appearing to read 'JPY', is written over a printed name. The signature is stylized and cursive.

James P. Youngs

JPY/ceg

cc: Counsel of record (via ECF)

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